DEFENDANTS' FURTHER STATUS CONFERENCE STATEMENT

1	
2	
3	
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	

28

Defendants report as that the only significant changes from the parties' previous Joint Case Management Conference Statement, attached as Exhibit A, are as follows:

- 1. The parties have completed discovery, with the exception of depositions that have been ordered by, or may be ordered by, the Court.
- 2. Plaintiff filed two motions to compel that were scheduled for hearing on August 6, 2008 but are currently being rescheduled due to the magistrate judge's illness.
- 3. The parties have participated in mediation as directed by this Court. The mediation, however, was not successful. Defendants are not willing to mediate this matter again.
- 4, Defendants have also identified Rick McDonough as a potential witness in this matter.

Dated: August 15, 2008

Stephen J. Hirschfeld, Esq.
Kristen L. Williams, Esq.
CURIALE DELLAVERSON
HIRSCHFELD & KRAEMER, LLP
Counsel for Defendants
MICHAEL P. MCGRATH and ALL RISKS, LTD.